

## EXHIBIT 2

**From:** NYT-AI-SG-Service@simplelists.susmangodfrey.com on behalf of R. James Slaughter  
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**Sent:** Tuesday, May 7, 2024 6:04 PM  
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**Subject:** OpenAI deposition coordination  
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**EXTERNAL Email**

Counsel,

I write on behalf of the OpenAI defendants. I've addressed this email to Plaintiffs' counsel in the *In re OpenAI ChatGPT Litigation* pending in ND Cal, as well as plaintiffs' counsel in the *Authors Guild* and *NYT* cases pending in SDNY. I have also copied counsel for Microsoft. If I have left anyone off – my apologies, it was inadvertent.

As you all know, the above referenced cases involve overlapping facts, claims, issues, and defenses. The discovery sought by the various plaintiffs' groups is, not surprisingly, also overlapping. We expect that plaintiffs' counsel will seek to depose many of the same defense witnesses. We trust and expect that Plaintiffs agree that the parties should coordinate depositions to the greatest extent possible to avoid the undue burden and expense of multiple depositions of the same individual on the same issues. Along those lines, OAI intends to make its witnesses available one time, presumptively for 7 hours, which depositions may be used in all cases as if they had been taken in each case. Please confirm you are agreeable to such an approach and coordination. We would be happy to discuss as necessary.

Thanks,

Jamie

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